

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD M. WULF, JR., as an
individual and as a representative of the
classes,

Plaintiff,

v.

BANK OF AMERICA, N.A., and BAC
HOME LOANS SERVICING, L.P.,

Defendants.

Case No.: 2:10-cv-05176-MAM

**DECLARATION OF KAI RICHTER IN SUPPORT OF PLAINTIFF'S MOTION TO
AMEND THE COMPLAINT AND ADD A SECOND NAMED PLAINTIFF**

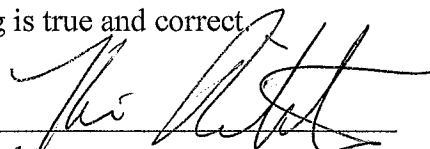
1. I am an associate attorney for Nichols Kaster, PLLP, and am one of the attorneys representing Plaintiff Richard M. Wulf, Jr. in the above-captioned action. I submit this declaration in support of Plaintiff's Motion to Amend the Complaint and Add a Second Named Plaintiff.

2. The parties have not yet exchanged their Rule 26(a) disclosures or taken any discovery. At the direction of the Court, discovery was stayed pending the outcome of Defendants' motion to dismiss.

3. As of the date of this motion, no scheduling order has been entered. The noticed Rule 16 conference [ECF No. 12] was postponed pending Defendants' Motion to Dismiss.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 29, 2011



Kai Richter